

POSITION PAPER

New TEN-E Regulation Proposal

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Keep TEN-E fit for gas grid transformation

The **European Biogas Association (EBA)** welcomes the European Commission's heightened focus on energy infrastructure. This renewed attention is timely and necessary. Europe continues to face heightened geopolitical instability, persistent energy price volatility, and structural vulnerabilities linked to external energy dependencies. This reinforces the need to strengthen energy security through domestic clean energy solutions.

In this regard, **biomethane** is a versatile energy carrier that can substantially reduce natural gas imports:

- By 2050, its production potential could replace a major share of EU natural gas demand, including up to more than 100% in a reduced natural gas scenario¹.
- It also benefits from a solid tracking system that enables cross-border trade of biomethane across the EU.

However, the current TEN-E Regulation Proposal does not include instruments to support the **transition of gas grids** towards clean energy, including biomethane. **Grid integration of biomethane** entails substantially lower investment than renewable electricity expansion, yet gas grids still require significant **upgrades**, such as smart sensors and reverse flow facilities, and **planning** that reflects national and regional trends in biomethane production and potential.

Against this background, EBA proposes the following recommendations to ensure the TEN-E framework is workable for renewable gas integration and supports robust infrastructure planning.

1. **Maintain and strengthen the “smart gas grids” PCI category** to support biomethane deployment and related infrastructure (Annex I; Annex II).
2. **Broaden the cross-border criterion for smart gas grids PCIs** to recognise replicable impacts beyond physical cross-border assets (Article 4; Annex IV).
3. **Maintain several scenarios to reflect different climate-neutrality pathways** (Article 11).

Recommendation 1: Reinstate and strengthen the “smart gas grids” PCI category to support biomethane deployment and related infrastructure (Annex I; Annex II)

The Commission proposal deletes the “smart gas grids” thematic area, which existed in the 2021 proposal and the TEN-E Regulation adopted in 2022. This removes a dedicated EU-level investment tool for gas grid innovation enabling renewable gas deployment.

On top of grid connection and reinforcements, biomethane scale-up requires technical enablers in the grid - such as smart devices, smart control centres, and devices to achieve appropriate gas quality standards. Removing the category severely risks under-prioritising projects that can deliver EU-wide learning, reduce costs through standardisation, and accelerate replication across Member States.

¹ Production of 1,600 TWh in 2050, estimated in Guidehouse, *Biogases towards 2040 and beyond* (2024); Total methane demand of 1,094 TWh in 2050 foreseen in TYNDP 2024 Scenario.

This is why **EBA urges reintroducing and enhancing the category** to make it operational and future-proof:

- **Maintain** the “smart gas grids” thematic area in the list of TEN-E infrastructure priorities and categories ([Annex I](#), [Annex II](#)).
- **Extend eligibility** beyond asset investments to include **studies and pilot projects** ([Annex II](#)).

This would send a clear EU political and investment signal that gas grid innovation enabling renewable gases remains aligned with the EU decarbonisation pathway. Supported projects will accelerate the transition of the gas grids to a future-proof infrastructure and enhance the grid access established under the EU Gas Package.

Recommendation 2: Broaden the cross-border criterion for smart gas grids PCIs (Art. 4, Annex IV)

The current cross-border criterion is primarily designed for infrastructure that physically crosses borders. This is too restrictive for smart gas grids projects, where the value lies in replicable local assets and digital solutions rather than cross-border pipes. Additionally, Distribution System Operators are unlikely to engage in a cross-border infrastructure project considering their remit is low-pressure pipelines at local level. As a result, high-impact projects with the potential to achieve EU-wide learning and standardisation are excluded.

EBA recommends that, for smart gas grids (SGG) projects, the cross-border relevance is based on the following principles:

- **Involvement of grid operators from at least two Member States** ([Article 4](#); [Annex IV](#)).
- **Demonstrated replicability and EU-wide impact** ([Annex IV](#)).

Smart gas grids could lead to results that can be reused by other grid operators and/or feed into EU-wide standards and benchmarks for biomethane infrastructure. Supporting such projects would help biomethane deployment across multiple Member States through shared solutions, best-practice exchange, peer learning and standardised implementation.

Recommendation 3: Maintain several scenarios to reflect different climate-neutrality pathways (Article 11)

The European Commission’s proposal relies on a single target-based scenario. A single scenario does not account for national policies and existing trends across countries. It does not adequately reflect that climate-neutrality pathways will vary across Member States depending on feedstock availability, demand patterns, and infrastructure starting points.

Major energy infrastructure planning needs a sounder analytical basis to remain aligned with real-world dynamics and policy trajectories. This is necessary to avoid blind spots that can exclude pragmatic options, including biomethane utilisation of existing infrastructure, and to reduce the risk of decisions that later result in stranded assets. It is also necessary to limit a potential disconnect between the central scenario and realities on the ground, given the role of the EU TYNDP in shaping national plans and PCI selection.

EBA recommends keeping the current two-scenario approach, reinforced by sensitivity analyses, to reflect alternative potential trajectories. In particular:

- *The National Trends Scenario should be maintained* alongside the target-based scenario to integrate NECP projections and regional dynamics.

- The target-based scenario should be *complemented with sensitivity analyses* to test how infrastructure can respond to deviations, including lower renewable electricity deployment or higher biomethane deployment than assumed in the scenario.

This approach would make the foundations of major infrastructure planning more robust in the face of uncertainty around climate-neutrality pathways. It would also better align EU-level planning assumptions with national policies and trends, reducing the risk of excluding infrastructure options that are necessary for biomethane grid integration and transport.

EBA remains available to provide market intelligence and technical input, and to engage with Member States and Members of the European Parliament to ensure the revised TEN-E framework contributes to climate neutrality and energy security.

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About the European Biogas Association (EBA)

EBA fully believes in the future potential of renewable gas in Europe. Founded in 2009, the association is committed to the deployment of sustainable biogas and biomethane production and use throughout the continent. EBA counts today on a well-established network of over 300 national associations and other organisations covering the whole biogas and biomethane value chain across Europe and beyond.